

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEVADA**

MARTIN JOHN STRUNGA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:24-cv-00429-JCM-EJY
)	
U.S. CITIZENSHIP AND IMMIGRATION)	
SERVICES, <i>et al.</i>,)	
)	
Defendants.)	
)	

UNOPPOSED MOTION TO EXTEND ANSWER DEADLINE

Plaintiff claims that U.S. Citizenship and Immigration Services (“USCIS”) arbitrarily denied his Form I-485, Application to Register Permanent Residence or Adjust Status, and his Form I-601, Application for Waiver of Grounds of Inadmissibility. Compl. ¶ 1. USCIS is considering options to resolve this case without judicial intervention. The assigned USCIS attorney scheduled a meeting with the Las Vegas Field Office Director (“FOD”) for April 30, 2024 to discuss these options. However, the meeting did not occur as planned due to a death in the FOD’s family. It is unclear when the FOD will return to the office.

A response to the complaint is currently due on May 7, 2024. The Court may extend this deadline for “good cause.” Fed. R. Civ. P. 6(b)(1)(A). Here, good cause exists to extend the response deadline through June 6, 2024 (by 30 days) because USCIS needs time to consider options to resolve this case without judicial intervention. A 30-day extension therefore would serve the interests of avoiding unnecessary litigation and conserving the Court’s resources.

Accordingly, Defendants move to extend the deadline to respond to the complaint by 30 days, to June 6, 2024. In an April 30, 2024 email, Plaintiff’s counsel (Joshua Mitson) advised that Plaintiff does not oppose this motion.

Dated: May 2, 2024

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Respectfully submitted,

/s/ Julian M. Kurz
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Counsel for Defendants

ORDER

IT IS SO ORDERED.

Clayton J. Zouachah
UNITED STATES MAGISTRATE JUDGE

Dated: May 2, 2024